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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:24-cv-01761-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**741 HAZEL STREET, CENTRAL
POINT, JACKSON COUNTY,
DISTRICT OF OREGON, WITH
BUILDINGS, APPURTENANCES AND
IMPROVEMENTS, *in rem*,**

Defendant.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to
21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

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II.

Defendant, *in rem*, 741 Hazel Street, Central Point, Jackson County, District of Oregon,
more particularly described as:

The Westerly 42.62 feet, as measured along Hazel Street, of the following described property: Commencing at the quarter section corner common to Sections 2 and 3 in Township 37 South, Range 2 West of the Willamette Meridian, Jackson County, Oregon; thence North 89° 51' 15" East along the center line of said Section 3 extended, a distance of 3.31 feet to a 1 1/2 inch iron bolt at the intersection of the Northerly line of Hazel Street in the City of Central Point, Oregon, and thence South 54° 51' West along the Northerly line of Hazel Street 240.0 feet to a 3/4 inch galvanized iron pipe for the true point of beginning; thence North 35° 05' 30" West 167.95 feet to the said center line of Section 3; thence North 89° 51' 15" East along said center line of Section 3 a distance of 185.38 feet to a point 107.42 feet West from the point of beginning; thence South 34° 26' East 61.64 feet; thence South 54° 51' West along the Northerly line of said Hazel Street 151.25 feet to the true point of beginning.

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, 741 Hazel Street, Central Point, Jackson County, District of Oregon,
was used or intended to be used to facilitate the illegal distribution of controlled substances in violation of 21 U.S.C. §§ 841, 846, and 856, and is forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Derek Docken, Task Force Officer with the Drug Enforcement Administration, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendant, *in rem*, 741 Hazel Street, Central Point, Jackson County, District of Oregon; that due notice be given to all interested persons to appear and show cause

why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action

DATED: **October 18, 2024.**

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

VERIFICATION

I, DEREK DOCKEN, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Task Force Officer with the Drug Enforcement Administration and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Derek Docken
DEREK DOCKEN
Task Force Officer
Drug Enforcement Administration